

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

ST. CLAIR COUNTY EMPLOYEES')	
RETIREMENT SYSTEM, Individually and on)	
Behalf of All Others Similarly Situated,)	
)	
Plaintiff,)	Civil Action No. 3:18-cv-00988
)	
vs.)	District Judge William L. Campbell, Jr.
)	Magistrate Judge Alistair E. Newbern
ACADIA HEALTHCARE COMPANY, INC.,)	
et al.,)	
)	
Defendants.)	
)	

**JOINT MOTION TO ALLOW DEPOSITION AFTER DEADLINE FOR COMPLETION
OF FACT DISCOVERY**

Pursuant to Federal Rule of Civil Procedure 16(b)(4) and Local Rule 7.01, Plaintiffs Chicago & Vicinity Laborers' District Council Pension Fund and New York Hotel Trades Counsel and Hotel Association of New York City, Inc. Pension Fund ("Plaintiffs") and Defendants Acadia Healthcare Company, Inc. ("Acadia"), Deborah H. Jacobs, as Executor of the Estate of Joey A. Jacobs, Brent Turner, and David Duckworth ("Defendants," and with Plaintiffs, the "Parties") jointly move the Court to allow the deposition of non-party Reeve B. Waud to take place on January 23, 2025, after the deadline for the completion of fact discovery. The Parties state the following:

1. The deadline for the Parties to complete fact discovery is December 13, 2024. *See* ECF No. 264.
2. Since the Court entered the operative Amended Case Management Order on May 28, 2024, the Parties have diligently been proceeding with discovery. Defendants have substantially completed their production of documents, including substantial completion of the

production of documents from the Priory Group in the U.K. Plaintiffs have conducted numerous depositions and have scheduled several more depositions to occur prior to the deadline for completion of fact discovery.

3. Plaintiffs have noticed the deposition of non-party Reeve B. Waud. The Parties and Mr. Waud have cooperated in good faith to schedule his deposition. However, due to scheduling conflicts, the Parties and Mr. Waud have agreed, subject to Court approval, to schedule his deposition for January 23, 2025, after the deadline for completion of fact discovery.

4. Given this, the Parties request that the Court allow this deposition to occur on January 23, 2025. Good cause exists to grant this motion and allow this single deposition to occur after the deadline for completion of fact discovery. The relief requested will not alter any deadlines in the Court's Amended Case Management Order. The deadline for the completion of expert discovery is May 2, 2025, and the deadline for motions for summary judgment and *Daubert* motions is May 23, 2025. *See* ECF No. 264. Consequently, allowing the deposition of Mr. Waud to take place on January 23, 2025, shortly after the cutoff of fact discovery, will not delay the progress of this action.

Therefore, the Parties respectfully request that the Court grant their Joint Motion and allow the deposition of Reeve B. Waud to take place on January 23, 2025.

Dated: November 4, 2024

Respectfully submitted,

/s/ Christopher M. Wood

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CERTIFICATE OF SERVICE

I hereby certify that on this November 4, 2024, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to the following:

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